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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE META PIXEL TAX FILING CASES

Master File No. 3:22-cv-07557 (SI)

This document relates to:

**STIPULATION AND [PROPOSED] ORDER
RE: EXTENSION OF TIME TO DISCLOSE
SOURCES OF ELECTRONICALLY
STORED INFORMATION AND SEARCH
TERMS**

All Actions

Judge: Hon. Virginia K. DeMarchi

1 Pursuant to Civil Local Rules 6-1(b), 6-2, 7-12, Plaintiffs and Defendant Meta Platforms, Inc.
2 (“Meta”) by and through their respective counsel of record, respectfully submit this stipulation and
3 proposed order regarding Meta’s deadline to disclose custodial and non-custodial ESI data sources and
4 search terms potentially responsive to Plaintiffs’ First, Second, and Third Requests for Production.

5 WHEREAS, on May 25, 2023, the Court set certain interim discovery deadlines, including an
6 order that parties responding to document requests disclose the custodial and non-custodial ESI data
7 sources that may contain responsive documents forty (40) days from the date of service, and disclose
8 search terms, if any, seven (7) days after disclosure of ESI data sources (Dkt. 83); and

9 WHEREAS, the May 25, 2023 Order states deadlines “may be modified by agreement of the
10 parties by means of a stipulated request and proposed order, or by the Court upon a showing of good
11 cause” (Dkt. 83 at 1); and

12 WHEREAS, to date Plaintiffs have served three sets of Requests for Production, deemed
13 served on June 21, 2023, July 11, 2023, and July 14, 2023, respectively; and

14 WHEREAS, to increase the efficiency of Meta’s investigation, Meta and Plaintiffs have
15 agreed to consolidated deadlines for the disclosure of ESI data sources and search terms for the three
16 sets of Requests for Production; and

17 WHEREAS, the parties previously requested, and the Court approved, an extension of time to
18 file proposed protective orders (Dkt. 66–67); and

19 WHEREAS, the parties previously requested, and the Court approved, a continuance of the
20 Initial Case Management Conference (Dkts. 42–43); and

21 WHEREAS, the parties have twice previously stipulated to an extension of time for Meta to
22 respond to the John Doe and Jane Doe Complaint (Dkts. 1, 20, and 24); and

23 WHEREAS, no further time modifications have been requested by the parties and this
24 proposed modification will not alter any other deadlines set by the Court;

25 NOW THEREFORE, the parties hereby stipulate subject to the approval of this Court, that:

26 1. Meta’s deadline to disclose custodial and non-custodial ESI data sources that may
27 contain documents responsive to Plaintiffs’ First, Second, and Third Requests for Production, is
28 September 6, 2023, and Meta’s deadline to disclose search terms is September 13, 2023.

1 Dated: July 21, 2023
2

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3 By: /s/ Lauren R. Goldman
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Dated: July 21, 2023

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CIVIL L.R. 5-1(h)(3) ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I, Lauren R. Goldman, hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: July 21, 2023

By: /s/ Lauren R. Goldman

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:

Defendant Meta Platforms, Inc.’s deadline to disclose custodial and non-custodial ESI data sources that may contain documents responsive to Plaintiffs’ First, Second, and Third Requests for Production, is September 6, 2023, and Meta’s deadline to disclose search terms is September 13, 2023.

Dated: July __, 2023

Honorable Virginia K. DeMarchi
United States Magistrate Judge